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July 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Thursday, July 19, 2012, John Nakahata and Kasey Chow, on behalf of T C Telephone LLC ("T C Telephone"), as well as Travis Graff, CEO of T C Telephone, spoke with Kimberly Scardino and Difie Osborne of the Telecommunications Access Policy Division. We discussed T C Telephone's Compliance Plan as originally filed on May 7, 2012, amended May 11, 2012 and again amended on May 16, 2012.

John Nakahata gave a brief introduction and overview of the Company. Travis Graff elaborated on the Company, its current operations, its intended plans for provision of wireless service, financial and technical capability to provide Lifeline service, and its enrollment procedures.

We discussed Travis Graff's experience in the telecommunications industry, particularly with T C Telephone's current provision of wireline retail and wireline Lifeline service in California. We also discussed T C Telephone's anticipated Lifeline enrollment procedures in states outside of California.

Finally, T C Telephone agreed to file a revised Compliance Plan with all suggested changes and additions. Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey C. Chow, Associate to Lance J.M. Steinhart
Attorney for T C Telephone LLC

Attachments

cc: Travis Graff
John Nakahata
Kimberly Scardino
Difie Osborne

T C TELEPHONE LLC

Federal Communications Commission

July 19, 2012



Agenda

- Introduction to T C Telephone LLC
- Financial Capability
- Technical Capability
- T C Telephone's Lifeline Plans
- Marketing / Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A



T C Telephone LLC

- Introduction
 - T C Telephone LLC is a small CLEC in California providing the state's population with Lifeline and non-Lifeline voice and data services for the last 9 years. The Company has been providing Lifeline services since August 2003. The Company is currently moving into providing cellular/wireless services in addition to voice and data.
- Names and Identifiers used by T C Telephone LLC:
 - T C Telephone LLC
 - T C Telephone
 - Horizon Cellular (d/b/a)



T C Telephone LLC

- In compliance with newly amended section 54.202, T C Telephone certifies:
 - It will comply with the service requirements applicable to the support that it receives;
 - It has the ability to remain functional in emergency situations;
 - It will satisfy applicable consumer protection and service quality standards; and
 - It is financially and technically capable of providing the Lifeline service.



Financial Capability

- T C Telephone is financially capable of providing the supported Lifeline service:
 - T C Telephone has been providing retail services to residential and business customers for 9 years
 - T C Telephone has operated debt free since inception and maintains its debt free status to continue providing quality service and growing the company



Technical Capability

- T C Telephone is technically capable of providing the supported Lifeline service :
 - Key Management Experience
 - **Travis Graff:** 12+ yrs in telecom business/management
 - Including 26 years of IT, 4 years of Military Communications, Cable TV, wireless & wireline service, starting Tehama County Telephone and T C Telephone LLC
 - **Steve Walden:** 30+ yrs in telecom business/management
 - Including extensive experience with AT&T, starting Diversicom, Inc., Tehama County Telephone, and T C Telephone LLC



T C Telephone's Lifeline Plans

- T C Telephone proposes a choice between four (4) Lifeline plans:
 - Unlimited Monthly Minutes
 - 750 Monthly Minutes
 - 450 Monthly Minutes
 - 250 Monthly Minutes
- All plans include:
 - Free calls to 911 Emergency Services
 - Free calls to Customer Service
 - Free Voicemail, Caller ID, and Call Waiting
 - Free Domestic Long Distance



T C Telephone's Lifeline Plans

Unlimited Talk and Text

- Unlimited Anytime Minutes
- Net Cost to CA Lifeline Customer - \$29.99
- Minutes DO NOT Rollover
- 1 text = 1 MB = 1 minute of voice

750 Minute Plan

- 750 Anytime Minutes
- Net Cost to CA Lifeline Customer - \$20.00
- Minutes DO NOT Rollover
- 1 text = 1 MB = 1 minute of voice



T C Telephone's Lifeline Plans

450 Minute Plan

- 450 Anytime Minutes
- Net Cost to CA Lifeline Customer - \$9.00
- Minutes DO NOT Rollover
- 1 text = 1 MB = 1 minute of voice

250 Minute Plan

- 250 Anytime Minutes
- Net Cost to CA Lifeline Customer - \$3.50
- Minutes DO NOT Rollover
- 1 text = 1 MB = 1 minute of voice



T C Telephone's Lifeline Plans

- Public Safety and 911 / E911 Access:
 - T C Telephone will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
 - T C Telephone will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier, Sprint
 - at the time of Lifeline service initiation
 - regardless of activation status and minute availability



Marketing / Advertising Plan

- All materials will comply with disclosure requirements:
 - Disclose company name under which it does business;
 - Explain in clear, easily understood language the following:
 - ✓ Only eligible consumer may enroll in the program;
 - ✓ What documentation is necessary for enrollment;
 - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - ✓ Lifeline is a government benefit program; and
 - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.



Marketing / Advertising Plan

- T C Telephone intends to market its Lifeline service via:

- Community Events
- Internet Banners
- TV / Radio spots
- Direct mail
- Flyers / Brochures

How to Apply

You may contact us at
877-242-2046 to apply over
the phone.

Our Customer Service
Representatives will be
happy to help you to apply
for
California Lifeline
Service.
Wireless California Lifeline
Service =Freedom



STAYING ON CALIFORNIA LIFELINE



If you are currently enrolled in California Lifeline and would like to remain in the program, you must renew every year. You will be mailed a pink envelope. You also have the option of qualifying by either enrollment in a public assistance program or by your income. Be sure to complete and sign and return the form with any required documents before the due date. You can also renew online at www.CaliforniaLifeLine.com using your PIN. If you do not renew by the due date, you will be removed from the program and charged the regular non-discounted rates for basic service.

California Lifeline Program
Provided by



Toll Free (877) 242-2046

Contact us:
customerservice@tctelephone.com



*California Lifeline
Program
offered through
TC Telephone, LLC*

A Program of the California
Public Utilities Commission

We keep you talking

Toll Free (877) 242-2046



Enrolling Lifeline Customers

- **Eligibility Confirmation:**

1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement

- **Events:** A secure photo/scan notebook will be utilized in the field to certify eligibility. Eligible customers will be given handsets and asked to activate by making first call.

- **Online/Phone:** ACS allows customers to upload their proof information. SSN required. Customer accounts are not set to active until first call is made.



Enrolling Lifeline Customers

- End-User Education and Disclosures:
 - Lifeline is a federal non-transferable benefit
 - Lifeline service is available for only one line per household
 - A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
 - Households are NOT permitted to receive benefits from multiple providers
 - Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government



Enrolling Lifeline Customers

- End User Attestations:
 - See Certification Form

California LifeLine Application Form
COPIES OR PARTIAL FORMS WILL NOT BE ACCEPTED.

0 F 3 6 7 5 4 2 5 5 1 2

PART C Eligibility - You may use either Method 1 Program-Based OR Method 2 Income-Based below to qualify for California LifeLine.

Method 1 Program-Based: If you or another person in your household is enrolled in any of the programs below, please identify the program by filling in the correct bubble and provide the name of that person in the Name box.
Sample: ☒ Correct

<input type="radio"/> Medicaid/Medi-Cal	<input type="radio"/> Low Income Home Energy Assistance Program (LIHEAP)
<input type="radio"/> Supplemental Security Income (SSI)	<input type="radio"/> Federal Public Housing Assistance or Section 8
<input type="radio"/> Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)	<input type="radio"/> Temporary Assistance for Needy Families (TANF) (CalWORKS, StanWORKS, WTW or GAIN)
<input type="radio"/> Healthy Families Category A	<input type="radio"/> National School Lunch's FREE Lunch Program (NSL)
<input type="radio"/> Tribal TANF	<input type="radio"/> Bureau of Indian Affairs General Assistance
<input type="radio"/> Women, Infants and Children Program (WIC)	<input type="radio"/> Head Start Income Eligible (Tribal Only)

Name: _____

(If you complete Method 1 above, do not complete Method 2 below)

Method 2 Income-Based: If the income level for your household is at or below the maximum California LifeLine income listed below, please identify your household size by filling in the correct bubble.
YOU MUST PROVIDE PROOF OF YOUR TOTAL HOUSEHOLD INCOME.

TOTAL # OF ADULTS AND CHILDREN IN YOUR HOUSEHOLD	MAXIMUM California LifeLine YEARLY INCOME
<input type="radio"/> 1-2 Members	\$24,000
<input type="radio"/> 3 Members	\$28,200
<input type="radio"/> 4 Members	\$34,000
<input type="radio"/> 5 Members	\$39,800
For each additional member after 5 members add \$5,800 to \$39,800	
<input type="radio"/> _____ Members	\$ _____

Provide **COPIES** of any of the following income documents. Do not tape or staple to this form.

- Prior year's state, federal, or tribal tax return; or
- Income statements or paycheck stubs for three consecutive months within the calendar year
- Child support document
- Statement of benefits from Social Security, Veterans Administration, retirement/pension, unemployment compensation, and/or workmen's compensation
- A divorce decree
- Other official documents

PART D DO NOT QUALIFY If you do not qualify for California LifeLine fill in the bubble below and sign the form.
☐ I do not qualify for California LifeLine

PART E Signature By signing below, I certify, under penalty of perjury, that the service address is my principal place of residence, I have not been claimed as a dependent on another person's tax return, and that the information in this form is true and correct. Please note the printed name must match the person's name in Part B of this form unless this form is signed by a Legal Guardian or a person with Power of Attorney.

Applicant Signature (required)	<input type="radio"/> Fill in if signed by a Legal Guardian or a person with Power of Attorney	Date: <table border="1"><tr><td>M</td><td>M</td><td>D</td><td>D</td><td>Y</td><td>Y</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>	M	M	D	D	Y	Y						
M	M	D	D	Y	Y									
Printed Name (required)														

PART F Please fill in if you prefer to receive future notifications in: ☐ Large Print ☐ Braille

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TELEPHONE, LLC
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Recertifying Lifeline Customers

- Annual Recertification Compliance: (ACS / Xerox)
 - T C Telephone will recertify its CA Lifeline customers via mail (USPS) through ACS/Xerox.
 - T C Telephone commits to re-certify the eligibility of all Lifeline customers as of June 1, 2012 by December 31, 2012 and report the results to USAC.
 - After 2012, T C Telephone will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
 - All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
 - In addition, T C Telephone will continue to follow any state-specific requirements.



Preventing Waste, Fraud & Abuse

- T C Telephone utilizes a diligent Enrollment Process
- T C Telephone's business model primarily employs direct, in-store or over the phone/internet, high quality contact and customer service
- T C Telephone will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- T C Telephone has a 60-day non-usage policy
- T C Telephone emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures



Preventing Waste, Fraud & Abuse

- Additional Measures to prevent waste, fraud & abuse:
- Duplicates Database
 - Pooled External Database (CGM, LLC)
 - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - *if T C Telephone draws \$5 million+ on an annual basis





QUESTIONS?
